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I, Tiffany R. Ellis, hereby declare as follows:

- I am a partner of Peiffer Wolf Care Kane Conway & Wise, an attorney licensed in the States of Michigan and Illinois and duly admitted to practice before this Court, representing Plaintiffs in the above caption action.
- 2. I submit this declaration in support of Plaintiffs' List of Disputed Entries for Special Master Review on April 21, 2025.
- 3. Plaintiffs incorporate the Discovery Letter Brief Regarding Disputed Entries for Special Master Review filed by All Plaintiffs on March 4, 2025. *See* ECF No. 2434. Plaintiffs incorporate the brief to support the specific reasons each entry on the List of Disputed Entries was challenged. The Brief included the general background of the privilege dispute process to date, the legal standard for Plaintiffs raising challenges to Defendants' privilege log entries, and a general argument for the challenges Plaintiffs raised.
- 4. The List of Disputed Entries for Special Master Review Plaintiffs provided on April 21, 2025 contained entries still in dispute for custodian Sachin Kansal.
- 5. The List of Disputed Entries for Special Master Review Plaintiffs provided on April 21, 2025 did not contain any entries for the custodians that overlapped with custodians already submitted to the Special Master for review.

Sachin Kansal

- 6. Defendants included approximately 835 entries for Sachin Kansal across its Tranche 1, Tranche 2, Tranche 3, and Tranche 4 privilege logs.
 - 7. Plaintiffs originally challenged approximately 266 of these 835 entries.
- 8. As of January 31, 2025¹, Defendants withdrew their claim of privilege to 12 entries in full and 40 entries in part.
- 9. On March 10, 2025, Defendants provided Plaintiffs with a revised privilege log after Defendants re-reviewed all entries in dispute pursuant to Master Order No. 2. Defendants withdrew their claim of privilege to 117 entries in full and 112 entries in part.

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¹ Defendants provided Plaintiffs a revised privilege log on January 31, 2025. This was the last revised privilege log Defendants provided before they started providing revised privilege logs in accordance with the Master Order No. 2. *See* ECF No. 2357.

- 10. Defendants provided Plaintiffs with a revised Privilege Log on April 18, 2025. In total, to date, Defendants logged 1,907 entries for Sachin Kansal and have withdrawn or will withdraw their claim of privilege to approximately 144 entries in full and 157 entries in part.
- 11. On March 25, 2025, Plaintiffs provided the Special Master and Defendants with a list of 77 entries in dispute for Sachin Kansal following a review of Uber's revised privilege log that included updated or additional information provided by Uber, documents produced with redactions, or lessons learned from Judge Cisneros' privilege orders and Defendants' March 14, 2025 privilege log.
- 12. On April 10, 2025, Plaintiffs provided the Special Master and Defendants with a supplemental list of 27 entries for Sachin Kansal from Defendants' April 1, 2025 and April 7, 2025 privilege logs.
- 13. On April 14, 2025, Plaintiffs provided the Special Master and Defendants with a supplemental list of 7 entries for Sachin Kansal from Defendants' April 12, 2025 privilege log.
- 14. On April 16, 2025, Defendants provided written response to Plaintiffs' list and the parties met and conferred. During the meet and confer process, Defendants informed Plaintiffs that they withdrew their claim to 13 entries in full and 43 entries in part since the submission on March 25, 2025.
- 15. On April 17, 2025 Plaintiffs provided the Special Master and Defendants with a list of 65 entries that remain in dispute for Sachin Kansal. The list did include 15 entries that Defendants will produce redacted versions at a future date.
- 16. On April 21, 2025 Plaintiffs provided the Special Master and Defendants with a list of 49 entries that remain in dispute for Sachin Kansal.

Executed this 21st day of April, 2025 in Detroit, Michigan.

/s/ Tiffany R. Ellis Tiffany R. Ellis